

COHEN & GREEN

January 17, 2023

Honorable Valerie Figueredo, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Rodriguez et al v. City of New York, et. al., 21-CV-10815 (PKC)

Dear Judge Figueredo:

I am co-counsel for Plaintiffs in the above-captioned matter. I write jointly with Defendants to ask that the Court adjourn the settlement conference currently scheduled for January 25, 2023 (Dkt. No. 27). Prior counsel for Defendants left the Law Department in December, and new counsel entered an appearance in this matter on January 4, 2023. The parties respectfully request a brief adjournment of the settlement conference for new defense counsel to get up to speed on the case, and for the parties to engage in settlement discussions prior to the conference, such that the conference is as productive as possible. Plaintiffs' counsel and defense counsel have litigated several cases before and believe it would be in the interests of judicial economy for them to have time to speak directly before engaging in a settlement conference; further, both counsel are highly familiar with the facts at issue (which span across several lawsuits) and would like to engage in conversations about the impact of those matters before engaging in the settlement conference.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Elena L. Cohen

Honorific/Pronouns: Ms., she/ her/ hers

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.